

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

ALICIA STREET, et al.,)	
)	
Plaintiff,)	
)	
v.)	Cause No. 4:19-CV-02590-CDP
)	
LT. COL. LAWRENCE O'TOOLE, et al.,)	
)	
Defendants.)	

**JOINT MOTION TO EXTEND DEADLINE TO FILE
MOTION FOR CLASS CERTIFICATION**

Plaintiffs and defendants move the Court to extend Plaintiffs' deadline to file a motion for class certification. In support of this motion, the parties state as follows:

1. The current deadlines under the amended Stipulated Order for Preliminary Schedule and Procedure require Plaintiffs to file a motion for class certification by November 30, 2020 (Doc. No. 30).

2. Defendants filed four motions to dismiss on March 16, 2020 (Doc. Nos. 19, 21, 23, 25). These motions remain pending. The future course of proceedings will be affected by the Court's ruling on those motions.

3. The parties have been conducting extensive discovery in related cases arising out of the events at issue in this cause. The scope of that discovery and limitations related to the coronavirus pandemic have limited the parties' ability to conduct class discovery in this cause, including depositions. In order to allow the parties additional time to conduct this discovery, the parties jointly request that the Court extend Plaintiffs' deadline to file a motion for class certification to January 31, 2021.

4. No party will be prejudiced by the extension of the deadline proposed herein. The parties do not seek the extension for any improper purpose.

WHEREFORE, the parties respectfully request that the Court extend Plaintiffs' deadline to file Plaintiffs' motion for class certification, as stated above.

Respectfully submitted,

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